

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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CLEAR CHANNEL OUTDOOR, INC.,
Boston Division

Plaintiff,

v.

INTERNATIONAL UNION OF
PAINTERS AND ALLIED TRADES
AFL-CIO, CLC, DISTRICT COUNCIL 35,

Defendant.

C.A. No. 05-CV-10380 WGY

**DEFENDANT'S MOTION FOR LEAVE TO FILE A
REPLY MEMORANDUM OF LAW IN SUPPORT OF
ITS MOTION FOR A PRELIMINARY INJUNCTION**

NOW COMES Defendant, Painters and Allied Trades District Council No. 35, pursuant to Local Rule 7.1(B)(3), and respectfully moves for Leave of Court to File a Reply Memorandum in Support of its Motion for a Preliminary Injunction. As grounds for its motion, Defendant states as follows:

1. Defendant Painters and Allied Trades District Council No. 35 filed its Motion for a Preliminary Injunction and Memorandum of Law in Support of its Motion for a Preliminary Injunction on March 25, 2005.
2. Plaintiff Clear Channel Outdoor filed its Memorandum in Opposition to Defendant Painters and Allied Trades District Council No. 35's Motion for a Preliminary Injunction on April 8, 2005.
3. Plaintiff's Opposition raises arguments not addressed in Defendant's initial Memorandum of Law.

4. A hearing on Defendant's Motion for a Preliminary Injunction is scheduled for April 27, 2005.
5. A Reply Memorandum from Defendant will provide Defendant with an opportunity to respond to Plaintiff's arguments prior to the hearing scheduled for April 27, 2005, thereby saving the Court's time at the hearing.

WHEREFORE, Defendant Painters and Allied Trades District Council No. 35 respectfully requests that its Motion be granted, and that the Court permit Defendant to file the attached Reply Memorandum.

Respectfully submitted,

For the Defendant,
Painters and Allied Trades
District Council No. #35
By its Attorney,

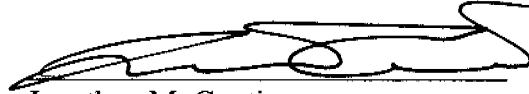


Jonathan M. Conti
BBO # 657163
Feinberg, Campbell & Zack, P.C.
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Boston, MA 02109
(617) 338-1976

DATED: April 19, 2005

CERTIFICATE OF COMPLIANCE

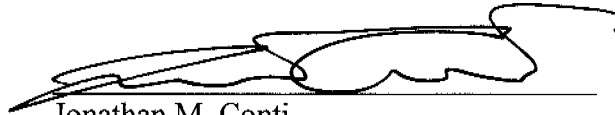
I, Jonathan M. Conti, hereby certify that pursuant to Local Rule 7.1, I have conferred in good faith with counsel of record in this matter.



Jonathan M. Conti

CERTIFICATE OF SERVICE

I, Jonathan M. Conti, hereby certify that I caused a copy of the foregoing document to be served in hand upon George A. Berman, Esq., Peabody & Arnold, LLP, 30 Rowes Wharf, Boston, MA 02110 and via overnight mail to Glenn E. Plosa, Esq., The Zinser Law Firm, P.C., 150 Second Avenue North, Suite 410, Nashville, TN 37201.



Jonathan M. Conti

April 19, 2005